



THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF CAMPAIGN & POLITICAL FINANCE

ONE ASHBURTON PLACE, ROOM 411
BOSTON, MASSACHUSETTS 02108
(617) 727-8352
(800) 462-OCPF

MICHAEL J. SULLIVAN
DIRECTOR

M-92-02
Issued: December 1992
Revised: November 1994

TO: Depository Candidates and Treasurers
FROM: Michael J. Sullivan *MJS*
Director
DATE: November 28, 1994
SUBJECT: Statement of Specific Purpose

The Office of Campaign and Political Finance ("OCPF") is frequently asked about the level of detail or specificity required by so-called depository candidates and their political committees regarding the statement of purpose required on depository checks.¹ This memorandum provides guidance in this area.

Depository candidates and their political committees are required to pay for all goods and services through specially formatted checks drawn only on their depository accounts. M.G.L. c. 55, s. 19 provides, in relevant part, that:

(c) . . . All checks drawn on such campaign accounts shall contain printed thereon a statement of purposes as follows:

PURPOSES OF PAYMENT.
(Check One and Fill in Specific Purpose)

TV, Radio ____	Printing ____	Signs or Displays ____
Newspaper ____	Office ____	Transfer of Fund ____
Meetings ____	Travel ____	Other ____
Specific Purpose _____		

1. The term "depository candidate" includes all candidates for nomination or election to all statewide offices as well as candidates for governor's council, district attorney, clerk of court, registrar of probate and insolvency, register of deeds, county commissioner, county treasurer, sheriff and candidates for citywide offices in the cities with a population of 100,000 or more - currently Boston, Lowell, Springfield and Worcester. The term also includes the treasurer of the state committee of each political party. See M.G.L. c.55, s.19.

When identifying the specific purpose of an expenditure, many depository candidates and/or their treasurers simply repeat the title of the relevant code. For example, a treasurer will check off "Travel" and under specific purpose write "travel." Repeating the general purpose does not comply with the law's requirement for a statement of specific purpose in addition to a statement of general purpose. Repeating the general purpose does not address the underlying purpose of this statutory mandate; to provide reasonably detailed public disclosure regarding depository committee and candidate expenditures.

In OCPF's opinion, the candidate or treasurer's statement of a specific purpose should be sufficiently detailed on its face to indicate that the purpose of a particular expenditure is consistent with the requirement of the law and/or relevant regulation.² For example, if a depository committee has made an expenditure of \$2,500 for 10,000 campaign brochures the treasurer should check the code "Printing" and note under the specific purpose: "10,000 campaign brochures." Some additional examples might include those listed below and on the sample depository check attached to this memorandum.

<u>Code Category</u>	<u>Specific Purpose</u>
TV, Radio	30 second candidate radio ads
Printing	5,000 bumper stickers
Signs or Displays	2 Billboard "Vote Smith" ads
Newspaper	10 Election day ads
Office	July/August Rent
Transfer of Fund	Labels purchased from party com.
Meetings	Conference, party politics, 8/5/92
Travel	Auto reimbursement for campaign event
Other	Dinner, campaign workers, 9/9/92

OCPF carefully monitors depository accounts to assure compliance by all committees with the statement of specific purpose requirement set forth in M.G.L. c.55, s.19.

If you have any questions regarding this memorandum please do not hesitate to contact your auditor.

2. M.G.L. c. 55, s. 6 requires that expenditures by statewide candidate political committees may be for "reasonable and necessary expenses directly related to the campaign" of the candidate. All other committees, including all other depository committees may expend money for "the enhancement of the political future of the candidate." See also M.G.L. c. 55, s. 1 which defines expenditure as "any expenditure of money . . . for the purpose of influencing the nomination or election of . . . a candidate . . ."